

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF WISCONSIN

In the Matter of the Seizure of
(Address or brief description of property or premises to be seized)

212 PREPAID ACCESS DEVICES CONTAINING
A STORED VALUE OF APPROXIMATELY \$26,789.03, MORE
SPECIFICALLY IDENTIFIED IN ATTACHED EXHIBIT A,
INCLUDING ALL FUNDS AVAILABLE ON THOSE CARDS

Case Number:

19-988-N(J)

APPLICATION FOR A WARRANT TO SEIZE PROPERTY SUBJECT TO FORFEITURE

I, Brian Wallander, being duly sworn depose and say:

I am a Detective and Task Force Agent assigned to the United States Secret Service Milwaukee Resident Office Financial Crimes Task Force, and have reason to believe that in the Eastern District of Wisconsin there is now certain property, namely, 212 prepaid access devices containing a stored value of approximately \$26,789.03, more specifically identified in attached Exhibit A, including all funds available on those cards, that are civilly forfeitable under 18 U.S.C. §§ 981(a)(1)(A) and (C), including cross-references to 18 U.S.C. §§ 1956(c)(7) and 1961(1), and criminally forfeitable under 18 U.S.C. §§ 981(a)(1)(C) and 982(a)(1) and (2) and 28 U.S.C. § 2461, as property that (1) was purchased with proceeds traceable to both wire fraud and access device fraud offenses, committed in violation of 18 U.S.C. §§ 1343 and 1029, respectively; and (2) was "involved in" a money laundering conspiracy in violation of 18 U.S.C. § 1956(h), and which property is therefore also subject to seizure for purposes of civil forfeiture under 18 U.S.C. § 981(b) and for purposes of criminal forfeiture under 18 U.S.C. § 982(b)(1) and 21 U.S.C. § 853(f).

The application is based on these facts:

- Continued on the attached sheet.
- Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Signature of Affiant
Brian Wallander, USSS

Sworn to before me, and subscribed in my presence

December 23, 2019
Date and time issued

at Milwaukee, Wisconsin
City and State

Nancy Joseph, U.S. Magistrate Judge
Name & Title of Judicial Officer



Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF APPLICATION FOR SEIZURE WARRANTS

I, Brian Wallander, having been duly sworn on oath, state as follows:

Affiant's Background

1. I am a Detective with the City of Greenfield Police Department and have been employed with them since 1996. I am currently assigned to the United States Secret Service Milwaukee Resident Office Financial Crimes Task Force ("MFCTF"). I was federally deputized in October 2015. My duties as a Detective and Task Force Agent with the Secret Service include investigating financial crimes, such as identity fraud, check fraud, credit card fraud, bank fraud, wire fraud, currency-counterfeiting offenses, and money laundering. During my employment with the Greenfield Police Department and the MFCTF, I have conducted several investigations that have resulted in seizures of criminally derived property, including monetary instruments.

2. Based on my training, experience, and participation in financial investigations involving the concealment of funds and assets in order to prevent detection by law enforcement agencies, I have observed that:

- Individuals involved in illegal activities often generate large amounts of money through those activities. These individuals often use the money to promote their illegal activities and to purchase legitimate personal items, such as housing, cars, jewelry, and clothing.
- Individuals attempting to conceal their income or illegal activities often place assets in the names of friends, relatives, or close associates to avoid detection of those assets by law enforcement agencies. Even though such assets are held in the names of other people, the true owners of the assets typically continue to exercise dominion and control over these assets.
- Individuals involved in illegal activities often use banks to conduct financial transactions involving proceeds of their criminal activities. Such individuals often establish a "front" business or shell corporation to generate cash, or to appear to generate cash, to make their wealth appear to have been legitimately obtained. Such individuals also often commingle their criminal proceeds with legitimate funds in bank or other financial accounts to conceal the illegal source of their criminal proceeds.
- Increasingly, individuals involved in illegal activities use "stored value cards," such as gift cards, to hold proceeds of criminal activity. To conceal the link between the criminal activity and the stored value cards holding proceeds of that criminal activity, criminals and money launderers often exchange the stored value cards originally used to hold the criminal proceeds for other stored value cards, for money orders, or for cash.

I refer to these methods that criminals often use to conceal the nature, source, and location of their criminal proceeds as “money laundering.”

3. Because I am submitting this affidavit for the limited purpose of establishing probable cause for the requested seizure warrants, I have not included in this affidavit every detail I know about this investigation. Rather, I have included only the information necessary to establish probable cause for the requested seizure warrants.

4. The facts set forth in this affidavit are based on my personal knowledge, including what I have learned through my training and experience as a law enforcement officer, my review of documents and other records obtained in the course of this investigation, and information I have obtained in the course of this investigation from witnesses having personal knowledge of the events and circumstances described herein and other law enforcement officers, all of whom I believe to be truthful and reliable.

Property Sought to be Seized

5. I submit this affidavit in support of an application for warrants to seize the following:

- a. 212 prepaid access devices containing a stored value of approximately \$26,789.03 in criminal proceeds, more specifically identified in Exhibit A attached hereto, including all funds available on those cards, (the “212 prepaid access devices”); and
- b. \$2,776.72 in United States currency being held as evidence at the Elm Grove, Wisconsin, Police Department under inventory numbers 19-000533-1, 19-000523-2, and 19-000524-3 (the “\$2,776.72”).

6. The 212 prepaid access devices and \$2,776.72 were seized as evidence in a criminal investigation into an alleged conspiracy to commit access device fraud and wire fraud by Gevorg Poghosyan, Gamlet Kazarian, Ashot Tamamyan, and Nadiya Pavulyak.

7. 208 of the 212 prepaid access devices are currently being held as evidence at the Greenfield Police Department, 5300 W. Layton Avenue, Greenfield, Wisconsin under inventory numbers 19-003740-4, 5, and 6.

8. Four of the 212 prepaid access devices and the \$2,776.72 are currently being held as evidence at the Elm Grove Police Department, 13600 Juneau Blvd., Elm Grove, Wisconsin.

9. Based on the facts set forth in this affidavit, I submit that there exists probable cause to believe that the funds contained in or stored on the 212 prepaid access devices, and the \$2,776.72, constitute proceeds of access device fraud and wire fraud, and are funds involved in a money laundering conspiracy.

10. More specifically, based on the facts set forth in this affidavit, I submit that there exists probable cause to believe that:

- Gevorg Poghosyan, Gamlet Kazarian, Ashot Tamamyan, and Nadiya Pavulyak (the “co-conspirators”) engaged:
 - in a scheme to defraud that involved materially false representations, the concealment of material facts, and the use of interstate wirings in furtherance of the scheme, in violation of the wire fraud statute, 18 U.S.C. § 1343; and
 - in access device fraud, by knowingly and with intent to defraud effecting transactions, with one or more access devices issued to another person or persons, to receive payment or any other thing of value during any 1-year period the aggregate value of which is equal to or greater than \$1,000, in violation of 18 U.S.C. § 1029(a)(5).
- As a part of the scheme, these co-conspirators stole unloaded, that is, non-activated, prepaid access devices, such as gift cards, from retail locations.
- The co-conspirators then altered the activation codes on prepaid access devices that they had stolen. They did so by:
 - printing new bar activation codes and bar code numbers on photo paper;
 - cutting out strips bearing those bar codes and numbers; and
 - carefully inserting those bar-code strips of paper into the cardboard packaging so that the inserted fake bar code numbers obscured the true activation codes of the prepaid access devices.

In this way, the co-conspirators made the altered activation bar codes in the packaging of those stolen prepaid access device packaging look authentic.

- But, in fact, the altered activation bar codes matched the bar codes of other prepaid access devices that the co-conspirators owned or controlled.
- In furtherance of their scheme, the co-conspirators went to retail locations and placed access devices bearing altered activation bar codes onto store shelves for unsuspecting customers to purchase.
- When an access device is scanned at the register, it is automatically activated. Such activation typically involves an interstate wiring as many

prepaid cards and gift cards are funded by financial institutions and accounts located outside Wisconsin.

- So, when unwitting purchasers went to the store and bought one of those prepaid access devices bearing an altered bar code, and the device was automatically activated upon purchase, the dollar value associated that access device was directed not to the purchased access device itself but instead to a different access device, associated with the altered bar code, that the co-conspirators owned or controlled.
- In this way, the co-conspirators fraudulently obtained proceeds through their wire and access-device fraud scheme.
- The co-conspirators sometimes used the proceeds they had obtained through this fraud scheme to buy other prepaid access devices. I submit that they appear to have made such “layered” purchases of gift cards in order to conceal the nature, source, location, control, and ownership of the fraud proceeds—and, thereby, to launder their fraud proceeds.
- On other occasions, the co-conspirators used their fraud proceeds to buy other retail items, such as clothing, gasoline, hotel rooms, and tools.
- I submit that the co-conspirators conspired to engage in these layered transactions—initially funded by proceeds of wire fraud and access device fraud—in order to launder the proceeds of those crimes by concealing or disguising the nature, location, source, ownership, and control of those criminal proceeds.

11. Based on the facts generally described above and set forth in detail below, I submit that there exists probable cause to believe that:

- A. The 212 prepaid access devices were stolen and traceable to both wire fraud as well as access device fraud offenses, committed in violation of 18 U.S.C. §§ 1343 and 1029, respectively;
- B. The \$2,776.72 was obtained with proceeds traceable to both wire fraud and access device fraud offenses, committed in violation of 18 U.S.C. §§ 1343 and 1029, respectively;
- C. The co-conspirators conspired to launder the proceeds of those offenses by engaging in the layered financial transactions described in paragraph 10 above, in violation of the money laundering conspiracy statute, 18 U.S.C. § 1956(h);
- D. The 212 prepaid access devices and \$2,776.72 are therefore subject to civil forfeiture under 18 U.S.C. §§ 981(a)(1)(A) and (C), including cross-

references to 18 U.S.C. §§ 1956(c)(7) and 1961(1), and to criminal forfeiture under 18 U.S.C. §§ 981(a)(1)(C) and 982(a)(1) and (2), and 28 U.S.C. § 2461; and

E. The 212 prepaid access devices and \$2,776.72 are subject to seizure under both the civil seizure statute, 18 U.S.C. § 981(b), as well as the criminal seizure statutes, 18 U.S.C. § 982(b)(1) and 21 U.S.C. § 853(f).

Facts Supporting Finding of Probable Cause for Issuance of Seizure Warrants

Ongoing investigation into access device fraud and wire fraud

12. I am currently assisting in the investigation and prosecution of a case involving wire fraud and access device fraud. As a part of their suspected scheme and conspiracy to defraud, Gevorg Poghosyan, Gamlet Kazarian, and Ashot Tamamyan traveled from the country of Ukraine; Moscow, Russia; and the State of California to the Eastern District of Wisconsin, where they met with a fourth co-conspirator, Nadiya Pavulyak.

13. I have investigated many cases in which individuals traveled to different geographical locations for the purpose of using prepaid access devices or gift cards, funded by criminal proceeds, to spend and launder those proceeds, due to the difficulty in tracing criminal proceeds spent via such gift cards. I also know that a preferred method of generating laundering criminal proceeds is to use stolen or illegally obtained gift cards to purchase new or “clean” gift cards, which, in turn, can then be sold or redeemed.

Summary of prepaid gift card alteration activity

14. Between October 31, 2019, and November 15, 2019, the Elm Grove Police Department and the Greenfield Police Department, along with other police agencies in the Milwaukee Metro area, recovered altered prepaid gift cards from retail locations such as Walgreens and CVS pharmacy stores. These activation bar code had been changed on these cards from their original bar code—as the investigation later revealed, to a bar code associated with card controlled by the perpetrators.

15. The perpetrators had apparently done so by printing the altered bar code onto photo paper; placing that altered bar code over the original activation bar code; and placing the altered access devices back on store shelves.

16. Then, when an unsuspecting customer bought one of the altered access devices, caused the value of the altered access devices to be transferred to an access device that the co-conspirators controlled.

17. In essence, through their conspiracy and scheme, the co-conspirators devised and took over the value of the altered access device upon its very purchase.

Victim D.E. – Vanilla Visa gift card ending 1677

18. Elm Grove Police Department Investigators responded to Walgreens located at 15350 W. Bluemound Road in Elm Grove, Wisconsin, for a fraud complaint. The victim, D.E., reported that on October 31, 2019, D.E. had purchased a \$200 Vanilla Visa gift card from that Walgreens. D.E. stated that when D.E. had attempted to redeem the gift card, it was not activated. D.E. further stated that there was a sticker with a barcode on the back of the card that did not match the cardboard sleeve that contained the card. The sticker with the activation code resulted in another card being activated, not the card that D.E. had presented to the cashier.

19. Investigators contacted Incomm, the service provider for Vanilla gift cards, whose principal place of business is in Atlanta, Georgia. Incomm verified that on October 31, 2019, at 4:32 p.m.—the time when D.E. had purchased and activated the above-referenced card—a different gift card, ending in digits 1677, was actually activated. The balance on the fraudulent account still had a remaining balance of \$200 so Incomm was able to transfer the funds back to D.E.’s original gift card.

Suspect Tamarayn Ashot seen on surveillance camera at Walgreens in Elm Grove

20. On November 5, 2019, Elm Grove Police Asst. Chief Hennen installed a pinhole camera on the gift card display at the Walgreens in Elm Grove, Wisconsin, to try to obtain video if the suspect returned to hang more tampered gift cards. On November 6, 2019, at 8:35 p.m., Sgt. Unger checked the gift cards and discovered that six more gifts cards with fraudulent barcodes had been left at the store.

21. Asst. Chief Hennen reviewed the Walgreens video, backwards, starting on November 6, 2019, at 8:35 p.m. No one was seen at the gift card racks until 6:01 p.m. that evening, when a subject appeared in the video. That subject removed approximately 20 gift cards from the rack and put them in his right pocket. The suspect then removed six gift cards from his left pocket and temporarily placed them on a rod on the display rack. The subject then placed more gift cards from the rack in his pocket and appeared to level out different hooks. The subject then took the six gift cards that he had originally removed from his left pocket and placed them on six different display rods so that the tampered gift cards were the front-facing cards and the first to be purchased by an unsuspecting customer. The subject then left the store. The subject was in the store for approximately one minute—and the only place he stopped was at the gift card rack. No vehicles were seen in the parking lot during the incident. The suspect was described as male, white, shaved head, wearing a black winter coat with a maroon sweatshirt underneath, dark pants, and dark shoes.

22. Assistant Chief Hennen distributed the suspect’s photo to area law enforcement and Walgreens Loss Prevention. Walgreens Loss Prevention shared the photographs with stores in southeastern Wisconsin.

23. On November 7, 2019, several stores in southeastern Wisconsin recovered similar altered gift cards.

24. On November 7, 2019, I read Asst. Chief Hennen's email and became aware of this fraud scheme. I then checked three local Walgreens stores in the City of Greenfield, Wisconsin, and discovered a total of 16 altered Vanilla gift cards—12 of which I recovered from the Walgreens located at 4296 S. 76th Street in Greenfield and 4 of which I recovered from the Walgreens located at 4688 S. 108th Street in Greenfield. I removed all 16 cards from the store display racks, as evidence.

25. Police reports obtained from South Milwaukee Police indicated that on November 7, 2019, 10:54 a.m., investigators had received a complaint of a suspicious person who had purchased gift cards using other gift cards. The same subject was also seen that same day placing tampered gift cards on the gift card rack. The subject in the South Milwaukee Walgreens was the same male suspect who was in the Elm Grove Walgreens surveillance video.

26. The suspect later was identified as Ashot Tamamyan upon his arrest on November 15, 2019.

Victim C.B. in Des Plaines, Illinois

27. Assistant Chief Hennen of the Elm Grove, Wisconsin Police Department located a victim, C.B., who reported that on November 6, 2019, at 10:50 a.m., he had purchased a \$100 gift card from a Walgreens store located at 21 Rand Road, Des Plaines, Illinois. C.B. stated that when C.B. had attempted to use the card, C.B. discovered that the card had never been activated. Asst. Chief Hennen identified the card that was activated as a result of C.B.'s transaction, which was card ending in **3338**. Assistant Chief Hennen also obtained a copy of the transaction report that indicated that the funds on the card ending in **3338** were then used to purchase a \$240 gift card ending in **6143** from Walgreens located at 15650 W. Greenfield Ave., Brookfield, Wisconsin. Video obtained from that transaction showed an approximately 40-year-old white female with blond hair conducting the transaction. The suspect female was seen arriving to and leaving from the Brookfield Walgreens in a silver BMW with a sunroof. This suspect was later identified as Nadiya Pavulyak.

28. Assistant Chief Hennen then obtained video surveillance for Home Depot, located at 6489 S. 27th Street, Franklin, Wisconsin, for transactions conducted on November 10, 2019, at 1:48 p.m. using gift card ending in **6143**. The female in the Brookfield Walgreens video, Nadiya Pavulyak, was the same person on the Home Depot video who had conducted the transactions using gift card ending in **6143**. Video also showed that same female had arrived to, and left from, Home Depot in the same silver BMW.

29. Nadiya Pavulyak conducted two transactions at the Franklin Home Depot, one for \$443.56, which was paid, in part, with the \$240 gift card ending in **6143**, while the remaining \$159.58 was paid for with card number ending in **4617**. The second transaction was a purchase in the amount of \$269.16, with \$240 being paid with card ending in **3683** and \$29.16 paid with card ending in **8092**.

30. Gift card ending in **8092** was purchased at Walgreens located at 370 E. Capitol Drive, Milwaukee, Wisconsin, on November 7, 2019, at 1:54 p.m. The subject in the Walgreens video who made that purchase was the same male seen on the Elm Grove surveillance camera,

Ashot Tamamyan. Ashot Tamamyan's purchase of this gift card that Nadiya Pavulyak then used demonstrates the connection between Tamamyan's and Nadiya Pavulyak, the female suspect conducting transactions at the Brookfield Walgreens and the Franklin Home Depot.

Fraudulently obtained access device from Wisconsin linked to purchases in Indiana

31. Investigators were alerted to a fraudulent card ending in **2366** that had been activated in the amount of \$499 on November 5, 2019, at 7:48 p.m. at the Walgreens located at 221 E. Sunset Drive in Waukesha. That card ending in **2366** was then used to purchase two other gift cards. Specifically, on November 7, 2019, at 9:44 a.m., the card ending in **2366** was used to purchase a \$200 gift card ending in **4846** at Target. And at 11:02 a.m. that same day, the card ending in **2366** was used to activate a \$250 gift card ending in **7074**.

32. Transaction details for the card ending in **7074** show multiple purchases from Nordstrom Rack in Wauwatosa, as well as several purchases from a Kwik Trip Store in Oak Creek.

33. Transaction details for card ending in **4846** show multiple transactions in Illinois and Indiana, notably a transaction at a Comfort Inn Hotel in Hobart, Indiana, and a purchase at a Target store in nearby Munster, Indiana. Detective Michael Gallagher of the Hobart Police Department verified that the card was used at the Comfort Inn for a two-night stay, November 9-10, 2019, room #307, for two adults, and that the individual who checked in used an Armenian Passport bearing the name Gevorg Poghosyan.

34. Asst. Chief Hennen asked Target's Corporate Investigator, Griffin Glynn, to review the transaction details for the purchase on November 10, 2019, at 11:55 p.m. in the amount of \$4.33 using card ending in **4846**.

35. Investigator Glynn reported that a larger white male had used card ending in **4846** to purchase coffee and then returned to a maroon-colored SUV. The subject resembled the person on the Armenian passport that was used for the room rental at the Comfort Inn, Gevorg Poghosyan. Another subject then exited the SUV and entered the Target store. This subject was the same subject, later identified as Ashot Tamamyan, depicted in the Elm Grove Walgreens video. That video showed Tamamyan walking to the gift card display and hanging several gift cards on the display rack. Investigators recovered those gift cards, which had been tampered.

36. The Munster Indiana Police Department had an ALPR (automated license plate recognition) camera at the exit to the Target parking lot that captured the license plate on the suspect SUV. Munster Indiana Police Lieutenant John Peirick identified the SUV on video entering the parking lot on November 10, 2019, at 11:50 a.m. and exiting at 12:06 p.m. The vehicle was a 2014 Kia Sorento bearing Wisconsin registration plate 818XXX. The plate listed to Nadiya Pavulyak at 5XXX S. Greenbrook Terrace, #6XXX, Greenfield, Wisconsin 53220. A WI DOT image of Pavulyak appears to match the female who conducted the Brookfield Walgreens and Franklin Home Depot transactions on the same day, November 10, 2019.

37. On November 13, 2019, at 4:00 a.m., Assistant Chief Hennen responded to Nadiya Pavulyak's residence, 5XXX S. Greenbrook Terrace, #6XXX, Greenfield, Wisconsin,

and located in the parking lot the silver BMW that was seen on video from the Brookfield Walgreens and Franklin Home Depot transactions. The license plate displayed on the silver BMW was Illinois BM39XXX, which listed to Maksym Pavulyak at 1XXX N. 24th Avenue, Melrose Park, Illinois 60160. Maksym Pavulyak's previous address was 5XXX S. Greenbrook Terrace, #6XXX, Greenfield, Wisconsin.

GPS tracking on suspect vehicles

38. On November 14, 2019, investigators obtained a search warrant to place a GPS device on both the Kia Sorrento and the BMW.

39. On the morning of November 15, 2019, investigators placed a GPS device on the BMW while it was parked in the parking lot at 5XXX S. Greenbrook Terrace, which is the address of Nadiya Pavulyak.

40. On November 15, 2019, at approximately 8:00 a.m., Target Corporate Investigator Glynn reported that a suspected fraudulently obtained gift card from the Indiana investigations had been used only a few hours earlier at Mai's Café Breakfast Bar and Grill, at 1716 W. Layton Avenue in Milwaukee. I responded to that location and saw the Kia Sorrento parked in the parking lot of the neighboring hotel, the Travelodge, also located at 1716 W. Layton Avenue, Milwaukee, Wisconsin.

41. Investigators began live surveillance on the Kia Sorrento at the Travelodge hotel. At approximately 9:00 a.m., the Kia Sorrento left the hotel. Investigators followed the vehicle to the Greenbrook Terrace apartment complex in Greenfield, Wisconsin.

42. During this live surveillance, the Kia Sorrento was seen parked at the 5XXX S. Greenbrook Terrace address at approximately 9:20 a.m. At that location, I observed three male subjects enter two vehicles in the parking lot—one was the Kia Sorrento and the other was a black BMW SUV that was unknown in our investigation up to this point.

43. Investigators watched as both vehicles exited the Greenbrook Terrace apartments and entered a gas station parking lot to fuel one of the vehicles. Greenfield Detective Bret Lepper took some still images as the three subjects were standing outside of the vehicles at the Mobil gas station located at 5030 W. Loomis Road, Greenfield, Wisconsin. Detective Lepper sent me these still images and I recognized one of the male subjects as being the same suspect shown in the Elm Grove surveillance camera video manipulating the gift cards. This person was later identified as Ashot Tamamyan. I recognized the second person as being Gevorg Poghosyan from the Armenian Passport used at the Hobart, Indiana, hotel.

44. Investigators followed both vehicles but lost track of the black BMW SUV.

45. On November 15, 2019, at approximately 11:30 a.m., investigators placed a GPS on the Kia Sorrento while it was parked in a public parking lot at the Southridge Mall. GPS data showed the Kia Sorrento had returned minutes later to Pavulyak's address at 5XXX S. Greenbrook Terrace, Greenfield, Wisconsin. The Kia Sorrento then departed from the Greenbrook address approximately one hour later.

46. That same day, investigators followed the Kia Sorrento after it left 5XXX S. Greenbrook Terrace. The vehicle was driven to several Walgreens and CVS stores in the City of Waukesha. After the suspects left those locations, Assistant Chief Hennen recovered altered access device cards from the display racks at two Walgreens stores and one CVS store. The Waukesha Police Department recovered altered access device cards from the display racks at a third Walgreens store.

47. Based on GPS data in conjunction with live surveillance, investigators anticipated the next store that the suspects likely planned to visit: the Walgreens at 230 Madison Street, in Waukesha, Wisconsin. Asst. Chief Hennen entered that Walgreens location before the suspects did so. The front seat passenger, later identified as Gamlet Kazarian, exited the Kia Sorrento, entered the store, and proceeded directly to the gift card rack. Assistant Chief Hennen saw Kazarian take several altered prepaid gift cards from Kazarian's pocket and place them onto the gift card rack. Kazarian then exited the store, returned to the Kia Sorrento, and left the parking lot. Assistant Chief Hennen recovered nine altered gift cards from the display rack.

48. Investigators decided to conduct a traffic stop the Kia Sorrento. Waukesha Police Detective and USSS TFO Luke Hallmark stopped the Kia Sorrento in the 200 block of Sunset Drive in Waukesha. Three subjects were taken into custody, none of whom spoke English. The subjects were identified as Gevorg Poghosyan, Gamlet Kazarian, and Ashot Tamamyan. Investigators recovered from the Kia Sorrento two bags containing approximately 200 to 300 gift cards that had been tampered and prepared to be hung onto gift card racks in stores.

November 15, 2019 execution of search warrant at Nadiya Pavulyak's residence, 5XXX S. Greenbrook Terrace, #6XXX, Greenfield, Wisconsin

49. On November 15, 2019, Elm Grove Police Assistant Chief Jason Hennen applied for and obtained a search warrant through Waukesha County Circuit Court for Nadiya Pavulyak's residence, 5XXX S. Greenbrook Terrace #6XXX, Greenfield, Wisconsin.

50. On November 15, 2019, at approximately 5:00 p.m., Greenfield Police Officer Andriy Nemesh surveilled this location until detectives arrived to execute the search warrant. Around that time, Officer Nemesh saw Nadiya Pavulyak exit her apartment with several large pieces of luggage and other items, which she placed into the passenger compartment and trunk of a silver BMW.

51. Officer Nemesh advised other officers that the BMW was leaving the apartment. Therefore, officers conducted a traffic stop on the vehicle in a parking lot several buildings to the south of Pavulyak's apartment. During the traffic stop, Pavulyak admitted that she was acquaintances with the co-conspirators, Gevorg Poghosyan, Gamlet Kazarian, and Ashot Tamamyan. Pavulyak told officers that she allowed the co-conspirators to use her Kia Sorrento.

52. Pavulyak gave officers consent to search the BMW and the luggage inside the BMW. Officers found in the vehicle two bar code readers, white garbage bags containing a very large number of torn up cardboard Vanilla Visa gift card display packaging materials with cards removed and a shoebox containing glue sticks, rubber bands, Post-It notes, and a package of

photo paper. Officers also located thousands of prepaid access device cards in various locations, including the following:

- a. In a large black suitcase found on the back seat:
 - i. 928 packaged Vanilla Visa gift cards in various denominations. All of the gift cards were altered in that they had a different bar code applied over the true activation bar code.
 - ii. A plastic bag containing 159 gift cards that were not in the manufacturer's original packaging. Those gift cards were neatly rubber banded together, mostly in stacks of 28 cards each. The stacks were also labeled with small post-it notes with the letters "WI" and a unique number.
- b. In a medium-sized silver suitcase found in the front seat: 397 packaged Vanilla Visa gift cards in various denominations. All of the gift cards were altered in that they had a different bar code applied over the true activation bar code.
- c. In a red shoe box found in the trunk: 1,007 gift cards that were not in the manufacturer's original packaging. They were neatly rubber banded together, mostly in stacks of 28 cards each. The stacks were also labeled with small post-it notes with the letters "WI" and a unique number.
- d. In a white shoebox found in the trunk: 1,045 gift cards that were not in the manufacturer's original packaging. They were neatly rubber banded together, mostly in stacks of 28 cards each. The stacks were also labeled with small post-it notes with the letters "WI" and a unique number.
- e. In a black purse found in the trunk: 441 prepaid gift cards that were not in the manufacturer's original packaging. They were neatly rubber banded together, mostly in stacks of 28 cards each. The stacks were also labeled with small post-it notes with the letters "WI" and a unique number.
- f. In a plastic Cermak bag found in the trunk: 233 packaged Vanilla Visa gift cards in various denominations. All of the gift cards were altered with a different bar code applied over the true activation bar code.

53. Officers escorted Pavulyak back to her apartment and searched her residence. Elm Grove Police found and seized property that Pavulyak had been shown on video purchasing at the Franklin Home Depot using fraud proceeds. These items, located in her bedroom, included: an HDX cord storage reel, one six-foot braided cord surge protector, one Rigged six-outlet surge protector, one Echo 20" chainsaw guide bar, one multi-use torch kit, one Lincoln electric welding helmet, one Rigged 10-gallon stainless steel wet/dry vacuum, three Rigged high

quality dry pick up dust bags, one Rigged standard wet/dry filter, two Ryobi chainsaw tune-up kits, four Echo 20" chainsaw blades, and one Décor 10-foot USB extension cord charger.

54. Officers also seized from the residence one HP laptop computer, one Brother printer model HL-L2395DW, one Acer computer, and one bar code scanner quick set-up instruction guide.

November 16, 2019 execution of search warrant at Room #108 of the Travelodge Hotel, 1716 W. Layton Avenue, Milwaukee, Wisconsin

55. On November 16, 2019, Asst. Chief Hennen obtained a search warrant for room #108 at the Travelodge Hotel, 1716 W. Layton Avenue, Milwaukee, Wisconsin. Hotel room #108 had been rented by one of the co-conspirators, Gevorg Poghosyan.

56. On November 16, 2019, at approximately 7:15 a.m., Elm Grove Police Investigators and I conducted a search of room #108. No persons were in the room at the time of the search. Investigators located several pieces of evidence related to the access device fraud investigation, including the following items seized as evidence:

- a. A silver and black medium-size suitcase containing miscellaneous items,
- b. Gevorg Poghosyan's wallet and identification,
- c. \$700 in United States currency,
- d. A flight itinerary for a flight from Chicago O'Hare to Stockholm on November 19, 2019,
- e. Two Target MasterCard gift cards,
- f. A blue HP Stream laptop (model #14-DS0003DX, serial #5CD9320S) located on the bed side table,
- g. A laptop charger and cord that was connected to the HP Stream laptop and plugged into a wall outlet, and
- h. A notebook that appeared to be a ledger for distribution of fraud proceeds.

Summary of Items Sought to be Seized

A total of 212 prepaid access devices or gift cards, more specifically identified in Exhibit A

57. As described above, officers seized a total of approximately 4,310 prepaid access devices, or gift cards, during the search of Pavulyak's BMW. Of those recovered access device cards, a total of approximately 2,752 were not in the manufacturer's retail packaging, a fact indicating that the cards had the potential to be, or to have been, activated and loaded with funds. The remaining approximately 1,558 packaged cards had a tampered/ altered barcodes, which

indicated that the cards were going to be placed back on the retailer's shelves and had not yet been activated.

58. Members of the US Secret Service Financial Crimes Task Force, Elm Grove Police Detectives, and I interrogated all of the loose 2,752 cards using the ERAD system. We found 208 of those access devices contained approximately \$26,189.99 in criminal proceeds. The 208 cards were placed into evidence at the Greenfield Police Department.

59. Elm Grove Police Department seized four prepaid gift cards from co-conspirator Gevorg Poghosyan upon his arrest. These cards were checked by Elm Grove Police using ERAD and found to have a value of approximately \$599.04. These four cards were placed into evidence at the Elm Grove Police Department.

60. Thus, these 212 seized access have a total value of approximately \$26,789.03, as set forth in Exhibit A.

A total of \$2,776.72 in United States currency

61. Officers also seized a total of \$2,076.72 in United States currency during the arrest of co-conspirators Gamlet Kazarian and Gevorg Poghosyan, as follows:

- a. A total of \$1,946.72 from Gamlet Kazarian – 19-\$100 bills, 1-\$20 bill, 1-\$10 bill, 1-\$5 bill, 11-\$1 bills, and 72 cents. (Elm Grove Police inventory number 19-000524-3).
- b. A total of \$130 from Gevorg Poghosyan – 1-\$50 bill, and 4-\$20 bills. (Elm Grove Police inventory number 19-000523-2).

62. Officers seized a total of \$700 in United States currency (7-\$100 bills) during execution of the search warrant at the Travelodge Hotel, Room #108, 1716 W. Layton Avenue, Milwaukee, Wisconsin. The currency was found inside luggage along with identifiers belonging to Gevorg Poghosyan. (Elm Grove Police property inventory 19-000533-1).

Conclusion

63. Based on the above facts, I submit that there exists probable cause to believe that co-conspirators Gevorg Poghosyan, Gamlet Kazarian, Ashot Tamamyan, and Nadiya Pavulyak the seized 212 prepaid access devices contain fraud proceeds obtained in violation of both the wire fraud statute, 18 U.S.C. § 1343, and device fraud statute, 18 U.S.C. § 1029.

64. I further submit that there exists probable cause to believe that the co-conspirators intended to use the 212 gift cards having a total value of approximately \$26,789.03 and the \$2,776.72 in United States currency as a means of laundering the proceeds of their access device fraud and wire fraud offenses.

65. I have been advised by asset forfeiture counsel for the United States Attorney's Office, Assistant United States Attorney Scott Campbell, that, according to the Pattern Criminal

Jury Instructions of the Seventh Circuit (2012 ed.), in order to establish concealment money laundering, in violation of 18 U.S.C. § 1956(a)(1)(B)(i), the government must prove the four following elements:

First, that the defendant knowingly conducted or attempted to conduct a financial transaction, which can include a purchase;

Second, that some or all of the property involved in the financial transaction was proceeds of a specified unlawful activity, specifically, wire fraud and access device fraud;

Third, that the person engaging in the financial transaction knew that the property involved in that transaction represented proceeds of some form of unlawful activity; and

Fourth, that the person engaging in the financial transaction knew that the transaction was designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of the specified unlawful activity - here, wire fraud and access device fraud.

66. Accordingly, I further submit that the seized 212 prepaid access devices containing approximately \$26,789.03 in stored value and the \$2,776.72 in United States currency were “involved in” a conspiracy to launder the proceeds of the wire fraud and access device fraud, in violation of the money laundering conspiracy statute, 18 U.S.C. § 1956(h).

67. I have been advised by forfeiture counsel for the U.S. Attorney’s Office that property “involved in” a money laundering violation is subject to civil forfeiture under 18 U.S.C. §§ 981(a)(1)(A) and to criminal forfeiture under 18 U.S.C. § 982(a)(1).

68. I have also been advised by forfeiture counsel for the U.S. Attorney’s Office that the phrase “involved in,” as used in the money laundering forfeiture statutes, includes “the money or other property being laundered (the corpus), any commissions or fees paid to the launderer, and any property used to facilitate the laundering offense.” *United States v. McGauley*, 279 F.3d 62, 76 n.14 (1st Cir. 2002); *see also United States v. Baker*, 227 F.3d 955, 967 (7th Cir. 2000) (all real and personal property used to commit the money laundering offense is subject to forfeiture as property involved in the offense); *United States v. Reiner*, 397 F. Supp. 2d 101, 112 n.26 (D. Me. 2005) (collecting cases holding that forfeiture in a money laundering case includes the subject matter of the offense, commissions, and facilitating property).

69. Thus, because the 212 seized gift cards and the \$2,776.72 contain or constitute proceeds of the wire fraud and access device fraud offenses that the co-conspirators sought to launder as a part of their money laundering conspiracy, those gift cards and the currency were “involved in” the laundering conspiracy and are subject to forfeiture on that ground.

70. Finally, I submit that a restraining order under 21 U.S.C. § 853(e) may not be sufficient to assure the availability of the funds for forfeiture because I have been advised of cases in which, even after restraining order or similar process has been issued to a financial institution, the funds sought to be restrained were not effectively restrained by the financial

institution. In my judgment, a seizure warrant would be the most effective way to assure the availability of the money sought to be seized for forfeiture by the accompanying seizure warrant.

71. Based on the above facts, I submit that there exists probable cause to believe that:

- a. The 212 prepaid access devices and the \$2,776.72 in United States currency sought to be seized were purchased and obtained with proceeds traceable to both wire fraud and access device fraud offenses, committed in violation of 18 U.S.C. §§ 1343 and 1029, respectively;
- b. Those 212 prepaid access devices, along with \$2,776.72 in United States currency, were also “involved in” a money laundering conspiracy in that the co-conspirators sought to launder the proceeds of their wire fraud and access device fraud offenses, in violation of the money laundering conspiracy statute, 18 U.S.C. § 1956(h);
- c. The 212 prepaid access devices, along with \$2,776.72 in United States currency, are therefore subject to civil forfeiture under 18 U.S.C. §§ 981(a)(1)(A) and (C), including cross-references to 18 U.S.C. §§ 1956(c)(7) and 1961(1), and to criminal forfeiture under 18 U.S.C. §§ 981(a)(1)(C) and 982(a)(1) and (2) and 28 U.S.C. § 2461; and
- d. The 212 prepaid access devices, along with \$2,776.72 in United States currency, are subject to seizure under both the civil seizure statute, 18 U.S.C. § 981(b), as well as the criminal seizure statutes, 18 U.S.C. § 982(b)(1) and 21 U.S.C. § 853(f).

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Exhibit A

No.	Bank	Account Number	Brand	Balance
1	Metabank	425097XXXXXX3999	VISA	\$200.00
2	Metabank	425097XXXXXX1284	VISA	\$200.00
3	Metabank	425097XXXXXX4400	VISA	\$200.00
4	Metabank	425097XXXXXX0203	VISA	\$200.00
5	Metabank	425097XXXXXX0345	VISA	\$19.04
6	Metabank	425097XXXXXX4164	VISA	\$200.00
7	The Bancorp Bank	484718XXXXXX3441	VISA	\$20.00
8	The Bancorp Bank	484718XXXXXX8308	VISA	\$20.00
9	The Bancorp Bank	484718XXXXXX1175	VISA	\$75.00
10	The Bancorp Bank	484718XXXXXX3112	VISA	\$180.00
11	The Bancorp Bank	484718XXXXXX9260	VISA	\$315.00
12	The Bancorp Bank	484718XXXXXX2740	VISA	\$100.00
13	The Bancorp Bank	484718XXXXXX4648	VISA	\$40.00
14	The Bancorp Bank	484718XXXXXX8415	VISA	\$100.00
15	The Bancorp Bank	484718XXXXXX9931	VISA	\$30.00
16	The Bancorp Bank	484718XXXXXX9576	VISA	\$75.00
17	The Bancorp Bank	484718XXXXXX9674	VISA	\$60.00
18	The Bancorp Bank	484718XXXXXX5597	VISA	\$20.00
19	The Bancorp Bank	484718XXXXXX4123	VISA	\$25.00
20	The Bancorp Bank	484718XXXXXX8013	VISA	\$110.00
21	The Bancorp Bank	484718XXXXXX0801	VISA	\$190.00
22	The Bancorp Bank	484718XXXXXX2923	VISA	\$20.00
23	The Bancorp Bank	484718XXXXXX3810	VISA	\$500.00
24	The Bancorp Bank	484718XXXXXX3028	VISA	\$200.00
25	The Bancorp Bank	484718XXXXXX9512	VISA	\$500.00
26	The Bancorp Bank	484718XXXXXX8546	VISA	\$20.00
27	The Bancorp Bank	484718XXXXXX4649	VISA	\$150.00
28	The Bancorp Bank	484718XXXXXX1038	VISA	\$174.00
29	The Bancorp Bank	484718XXXXXX1518	VISA	\$40.00
30	The Bancorp Bank	484718XXXXXX4894	VISA	\$30.00
31	The Bancorp Bank	484718XXXXXX1683	VISA	\$40.00
32	The Bancorp Bank	484718XXXXXX5993	VISA	\$30.00
33	The Bancorp Bank	484718XXXXXX9748	VISA	\$75.00
34	The Bancorp Bank	484718XXXXXX5992	VISA	\$125.00
35	The Bancorp Bank	484718XXXXXX6041	VISA	\$100.00
36	The Bancorp Bank	484718XXXXXX4534	VISA	\$85.00
37	The Bancorp Bank	484718XXXXXX2277	VISA	\$30.00
38	The Bancorp Bank	484718XXXXXX7798	VISA	\$94.05
39	The Bancorp Bank	484718XXXXXX4579	VISA	\$50.00
40	The Bancorp Bank	484718XXXXXX3596	VISA	\$150.00
41	The Bancorp Bank	484718XXXXXX1839	VISA	\$70.00
42	The Bancorp Bank	484718XXXXXX3807	VISA	\$50.00
43	The Bancorp Bank	484718XXXXXX0817	VISA	\$100.00

No.	Bank	Account Number	Brand	Balance
44	The Bancorp Bank	484718XXXXXX1571	VISA	\$60.00
45	The Bancorp Bank	484718XXXXXX9077	VISA	\$100.00
46	The Bancorp Bank	484718XXXXXX6355	VISA	\$100.00
47	The Bancorp Bank	484718XXXXXX1332	VISA	\$100.00
48	The Bancorp Bank	484718XXXXXX3685	VISA	\$70.00
49	The Bancorp Bank	484718XXXXXX9062	VISA	\$20.00
50	The Bancorp Bank	484718XXXXXX4659	VISA	\$30.00
51	The Bancorp Bank	484718XXXXXX3367	VISA	\$249.99
52	The Bancorp Bank	484718XXXXXX2047	VISA	\$30.00
53	The Bancorp Bank	484718XXXXXX7987	VISA	\$40.00
54	The Bancorp Bank	484718XXXXXX1315	VISA	\$500.00
55	The Bancorp Bank	484718XXXXXX1375	VISA	\$500.00
56	The Bancorp Bank	484718XXXXXX3301	VISA	\$500.00
57	The Bancorp Bank	484718XXXXXX9414	VISA	\$100.00
58	The Bancorp Bank	484718XXXXXX6206	VISA	\$200.00
59	The Bancorp Bank	484718XXXXXX2184	VISA	\$50.00
60	The Bancorp Bank	484718XXXXXX9367	VISA	\$20.00
61	The Bancorp Bank	484718XXXXXX3565	VISA	\$500.00
62	The Bancorp Bank	484718XXXXXX9033	VISA	\$100.00
63	The Bancorp Bank	484718XXXXXX2985	VISA	\$20.00
64	The Bancorp Bank	484718XXXXXX9782	VISA	\$20.00
65	The Bancorp Bank	484718XXXXXX3112	VISA	\$25.00
66	The Bancorp Bank	484718XXXXXX2832	VISA	\$20.00
67	The Bancorp Bank	484718XXXXXX9845	VISA	\$100.00
68	The Bancorp Bank	484718XXXXXX9544	VISA	\$150.00
69	The Bancorp Bank	48471XXXXXX78329	VISA	\$59.00
70	The Bancorp Bank	484718XXXXXX6794	VISA	\$400.00
71	The Bancorp Bank	484718XXXXXX6829	VISA	\$30.00
72	The Bancorp Bank	484718XXXXXX3913	VISA	\$350.00
73	The Bancorp Bank	484718XXXXXX5464	VISA	\$65.00
74	The Bancorp Bank	484718XXXXXX2941	VISA	\$30.00
75	The Bancorp Bank	484718XXXXXX2436	VISA	\$75.00
76	The Bancorp Bank	484718XXXXXX3358	VISA	\$500.00
77	The Bancorp Bank	484718XXXXXX2561	VISA	\$500.00
78	The Bancorp Bank	484718XXXXXX1727	VISA	\$500.00
79	The Bancorp Bank	484718XXXXXX3223	VISA	\$30.00
80	The Bancorp Bank	484718XXXXXX5232	VISA	\$30.00
81	The Bancorp Bank	484718XXXXXX9787	VISA	\$30.00
82	The Bancorp Bank	484718XXXXXX0894	VISA	\$500.00
83	The Bancorp Bank	484718XXXXXX7947	VISA	\$50.00
84	The Bancorp Bank	484718XXXXXX7913	VISA	\$500.00
85	The Bancorp Bank	484718XXXXXX6284	VISA	\$125.00
86	The Bancorp Bank	484718XXXXXX3808	VISA	\$30.00
87	The Bancorp Bank	484718XXXXXX9097	VISA	\$75.00
88	The Bancorp Bank	484718XXXXXX6031	VISA	\$37.95

No.	Bank	Account Number	Brand	Balance
89	The Bancorp Bank	484718XXXXXX7261	VISA	\$20.00
90	The Bancorp Bank	484718XXXXXX6586	VISA	\$110.00
91	The Bancorp Bank	484718XXXXXX5546	VISA	\$240.00
92	The Bancorp Bank	484718XXXXXX0488	VISA	\$30.00
93	The Bancorp Bank	484718XXXXXX5133	VISA	\$20.00
94	The Bancorp Bank	484718XXXXXX8837	VISA	\$200.00
95	The Bancorp Bank	484718XXXXXX3187	VISA	\$20.00
96	The Bancorp Bank	484718XXXXXX6259	VISA	\$500.00
97	The Bancorp Bank	484718XXXXXX0181	VISA	\$200.00
98	The Bancorp Bank	484718XXXXXX8686	VISA	\$20.00
99	The Bancorp Bank	484718XXXXXX6008	VISA	\$150.00
100	The Bancorp Bank	484718XXXXXX6174	VISA	\$50.00
101	The Bancorp Bank	484718XXXXXX8978	VISA	\$150.00
102	The Bancorp Bank	484718XXXXXX4074	VISA	\$40.00
103	The Bancorp Bank	484718XXXXXX3222	VISA	\$75.00
104	The Bancorp Bank	484718XXXXXX1627	VISA	\$60.00
105	The Bancorp Bank	484718XXXXXX4095	VISA	\$260.00
106	The Bancorp Bank	484718XXXXXX4590	VISA	\$30.00
107	The Bancorp Bank	484718XXXXXX6625	VISA	\$500.00
108	The Bancorp Bank	484718XXXXXX4001	VISA	\$75.00
109	The Bancorp Bank	484718XXXXXX2628	VISA	\$20.00
110	The Bancorp Bank	484718XXXXXX9679	VISA	\$200.00
111	The Bancorp Bank	484718XXXXXX0306	VISA	\$125.00
112	The Bancorp Bank	484718XXXXXX8738	VISA	\$250.00
113	The Bancorp Bank	484718XXXXXX3212	VISA	\$100.00
114	The Bancorp Bank	484718XXXXXX2359	VISA	\$20.00
115	The Bancorp Bank	484718XXXXXX2955	VISA	\$300.00
116	The Bancorp Bank	484718XXXXXX6610	VISA	\$400.00
117	The Bancorp Bank	484718XXXXXX3287	VISA	\$100.00
118	The Bancorp Bank	484718XXXXXX9567	VISA	\$100.00
119	The Bancorp Bank	484718XXXXXX1578	VISA	\$500.00
120	The Bancorp Bank	484718XXXXXX0589	VISA	\$20.00
121	The Bancorp Bank	484718XXXXXX8519	VISA	\$250.00
122	The Bancorp Bank	484718XXXXXX8380	VISA	\$200.00
123	The Bancorp Bank	484718XXXXXX6344	VISA	\$70.00
124	The Bancorp Bank	484718XXXXXX7385	VISA	\$129.00
125	The Bancorp Bank	484718XXXXXX6095	VISA	\$20.00
126	The Bancorp Bank	484718XXXXXX2723	VISA	\$50.00
127	The Bancorp Bank	484718XXXXXX7617	VISA	\$20.00
128	The Bancorp Bank	484718XXXXXX9485	VISA	\$20.00
129	The Bancorp Bank	484718XXXXXX2370	VISA	\$40.00
130	The Bancorp Bank	484718XXXXXX6169	VISA	\$30.00
131	The Bancorp Bank	484718XXXXXX7233	VISA	\$500.00
132	The Bancorp Bank	484718XXXXXX0617	VISA	\$40.00
133	The Bancorp Bank	484718XXXXXX2476	VISA	\$190.00

No.	Bank	Account Number	Brand	Balance
134	The Bancorp Bank	484718XXXXXX3861	VISA	\$50.00
135	The Bancorp Bank	484718XXXXXX1291	VISA	\$100.00
136	The Bancorp Bank	484718XXXXXX0511	VISA	\$35.00
137	The Bancorp Bank	484718XXXXXX3187	VISA	\$100.00
138	The Bancorp Bank	484718XXXXXX4477	VISA	\$60.00
139	The Bancorp Bank	484718XXXXXX0237	VISA	\$25.00
140	The Bancorp Bank	484718XXXXXX1128	VISA	\$100.00
141	The Bancorp Bank	484718XXXXXX3283	VISA	\$75.00
142	The Bancorp Bank	484718XXXXXX9467	VISA	\$30.00
143	The Bancorp Bank	484718XXXXXX4282	VISA	\$200.00
144	The Bancorp Bank	484718XXXXXX3640	VISA	\$104.00
145	The Bancorp Bank	484718XXXXXX7874	VISA	\$500.00
146	The Bancorp Bank	484718XXXXXX0151	VISA	\$40.00
147	The Bancorp Bank	484718XXXXXX9235	VISA	\$154.00
148	The Bancorp Bank	484718XXXXXX0012	VISA	\$30.00
149	The Bancorp Bank	484718XXXXXX4655	VISA	\$40.00
150	The Bancorp Bank	484718XXXXXX6358	VISA	\$100.00
151	The Bancorp Bank	484718XXXXXX4986	VISA	\$100.00
152	The Bancorp Bank	484718XXXXXX1019	VISA	\$100.00
153	The Bancorp Bank	484718XXXXXX4232	VISA	\$100.00
154	The Bancorp Bank	484718XXXXXX8732	VISA	\$100.00
155	The Bancorp Bank	484718XXXXXX6276	VISA	\$100.00
156	The Bancorp Bank	484718XXXXXX2644	VISA	\$100.00
157	The Bancorp Bank	484718XXXXXX7338	VISA	\$100.00
158	The Bancorp Bank	484718XXXXXX5533	VISA	\$100.00
159	The Bancorp Bank	484718XXXXXX8486	VISA	\$25.00
160	The Bancorp Bank	484718XXXXXX9761	VISA	\$65.00
161	The Bancorp Bank	484718XXXXXX2827	VISA	\$50.00
162	The Bancorp Bank	484718XXXXXX9227	VISA	\$100.00
163	The Bancorp Bank	484718XXXXXX3266	VISA	\$500.00
164	The Bancorp Bank	484718XXXXXX1205	VISA	\$100.00
165	The Bancorp Bank	484718XXXXXX0420	VISA	\$20.00
166	The Bancorp Bank	484718XXXXXX6328	VISA	\$100.00
167	The Bancorp Bank	484718XXXXXX5031	VISA	\$40.00
168	The Bancorp Bank	484718XXXXXX1310	VISA	\$25.00
169	The Bancorp Bank	484718XXXXXX1636	VISA	\$40.00
170	The Bancorp Bank	484718XXXXXX9921	VISA	\$40.00
171	The Bancorp Bank	484718XXXXXX5419	VISA	\$100.00
172	The Bancorp Bank	484718XXXXXX6103	VISA	\$100.00
173	The Bancorp Bank	484718XXXXXX0917	VISA	\$100.00
174	The Bancorp Bank	484718XXXXXX7762	VISA	\$100.00
175	The Bancorp Bank	484718XXXXXX3215	VISA	\$100.00
176	The Bancorp Bank	484718XXXXXX2050	VISA	\$100.00
177	The Bancorp Bank	484718XXXXXX5096	VISA	\$100.00
178	The Bancorp Bank	484718XXXXXX2905	VISA	\$100.00

No.	Bank	Account Number	Brand	Balance
179	The Bancorp Bank	484718XXXXXX2797	VISA	\$100.00
180	The Bancorp Bank	484718XXXXXX9459	VISA	\$100.00
181	The Bancorp Bank	484718XXXXXX6982	VISA	\$150.00
182	The Bancorp Bank	484718XXXXXX8151	VISA	\$200.00
183	The Bancorp Bank	484718XXXXXX8960	VISA	\$40.00
184	The Bancorp Bank	484718XXXXXX1558	VISA	\$20.00
185	The Bancorp Bank	484718XXXXXX9245	VISA	\$150.00
186	The Bancorp Bank	484718XXXXXX0593	VISA	\$75.00
187	The Bancorp Bank	484718XXXXXX7963	VISA	\$25.00
188	The Bancorp Bank	484718XXXXXX5292	VISA	\$20.00
189	The Bancorp Bank	484718XXXXXX6888	VISA	\$60.00
190	The Bancorp Bank	484718XXXXXX9865	VISA	\$172.00
191	The Bancorp Bank	484718XXXXXX2221	VISA	\$50.00
192	The Bancorp Bank	484718XXXXXX2389	VISA	\$500.00
193	The Bancorp Bank	484718XXXXXX7717	VISA	\$40.00
194	The Bancorp Bank	484718XXXXXX7134	VISA	\$20.00
195	The Bancorp Bank	484718XXXXXX3628	VISA	\$30.00
196	The Bancorp Bank	484718XXXXXX6816	VISA	\$150.00
197	The Bancorp Bank	484718XXXXXX3052	VISA	\$180.00
198	The Bancorp Bank	484718XXXXXX3840	VISA	\$40.00
199	The Bancorp Bank	484718XXXXXX2783	VISA	\$250.00
200	The Bancorp Bank	484718XXXXXX4179	VISA	\$125.00
201	The Bancorp Bank	484718XXXXXX4230	VISA	\$30.00
202	The Bancorp Bank	484718XXXXXX7575	VISA	\$250.00
203	The Bancorp Bank	484718XXXXXX3172	VISA	\$75.00
204	The Bancorp Bank	484718XXXXXX9922	VISA	\$40.00
205	The Bancorp Bank	484718XXXXXX6075	VISA	\$40.00
206	The Bancorp Bank	484718XXXXXX5713	VISA	\$50.00
207	The Bancorp Bank	484718XXXXXX8460	VISA	\$45.00
208	The Bancorp Bank	484718XXXXXX7961	VISA	\$40.00
209	The Bancorp Bank	484718XXXXXX9442	VISA	\$75.00
210	The Bancorp Bank	484718XXXXXX6526	VISA	\$21.00
211	The Bancorp Bank	484718XXXXXX0075	VISA	\$100.00
212	The Bancorp Bank	484718XXXXXX2037	VISA	\$100.00
			Total:	\$26,789.03